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September 27, 2010

HAND DELIVERED

Document Processing Desk [AMEND]
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

ATTENTION: Velma Noble - Product Manager, Team 31

SUBJECT: *Sterilex Corporation
Ultra Klean Solution 1 (EPA Reg. No. 63761-3)
Application for Label Amendment - Minor Label Changes to Directions For Use
Re-Submission in Response to Agency Letter Dated July 12, 2010
This Submission is NOT Subject to PRIA fees*

Dear Ms. Noble:

On behalf Sterilex Corporation, I am re-submitting an Amendment application in response to the July 12, 2010 Agency letter to make minor changes to the product label for **Ultra Klean Solution 1 (EPA Reg. No. 63761-3)**.

Per our September 16, 2010 telephone conference with the Agency, we have removed the proposed disinfectant use on bathtubs, jacuzzis, spas, pools, and footbaths.

In addition, per our September 16, 2010 telephone conference, please note that Dennis Edwards of the Agency agreed that there is no need to register the Ultra Klean Solution II adjuvant/activator product at this time. The formula and label for the Ultra Klean Solution II adjuvant/activator product was reviewed at the time of registration for **Ultra Klean Solution 1** without concern. The Ultra Klean Solution II activator product only serves as a pH buffer and has no pesticidal activity by itself.

*Dennis Edwards -
do not need to register at this time.*

As indicated in the March 11, 2010 cover letter for the amendment, the changes are as follows:

- 1) Add optional marketing language for Sterilex's trademarked reference statement for the technology used for the product;
- 2) Revise the Directions for Use under the "Recirculating Cooling Water Systems, Including Cooling Towers, Evaporative Condensers, Dairy Sweet Water Systems And Brewery Pasteurizers" subheading to indicate instructions for initial dosing conditions, routine dosing conditions and continuous dosing conditions, as well as indicate the addition of the Ultra-Klean Solution 2 adjuvant is optional under certain conditions;
- 3) Revise the Directions for Use under the "Pulp and Paper Mills" subheading to indicate instructions for initial dosing conditions, routine dosing conditions and continuous dosing conditions, as well as indicate the addition of the Ultra-Klean Solution 2 adjuvant is optional under certain conditions;

- 4) Revise the Directions for Use under the "Air Washers" subheading to indicate the addition of the Ultra-Kleen Solution 2 adjuvant is optional under certain conditions;
- 5) Revise the Directions for Use under the "Dye Machines" subheading to indicate the addition of the Ultra-Kleen Solution 2 adjuvant is optional under certain conditions;
- 6) Revise the Directions for Use under the "Water-Jet Looms" subheading to indicate the addition of the Ultra-Kleen Solution 2 adjuvant is optional under certain conditions;
- 7) Revise the subheading of "Tanks, Piping And Industrial Equipment Used To Store And Convey Industrial Process Water or Aqueous Mixtures" to read "Tanks, Sumps, And Other Holding Vessels, Piping And Industrial Equipment Used To Store And Convey Industrial Or Commercial Process Water Or Aqueous Mixtures";
- 8) Revise the Directions for Use under the "Tanks, Sumps, And Other Holding Vessels, Piping And Industrial Equipment Used To Store And Convey Industrial Or Commercial Process Water Or Aqueous Mixtures" subheading to indicate instructions for badly fouled systems dosing conditions and subsequent dosing conditions, as well as indicate the addition of the Ultra-Kleen Solution 2 adjuvant is optional under certain conditions;
- 9) Revise the Directions for Use under the "Deionized Water Supply Systems Not Used In Food Processing, For Human Drinking Water Or Dental Lines" subheading to indicate instructions for badly fouled systems dosing conditions and subsequent dosing conditions, as well as indicate the addition of the Ultra-Kleen Solution 2 adjuvant is optional under certain conditions;
- 10) Add spas, pools and footbaths to "For Pre-Cleaning Of Whirlpool Bathtubs."

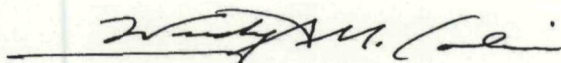
In addition to the aforementioned attachment, please find enclosed the following documents in support of this label Amendment:

- 1) Application for Pesticide Amendment;;
- 2) Certification With Respect To Citation of Data;
- 3) Data Matrix (both Agency Internal Use and Public File copies); and,
- 4) Five (5) copies of the proposed product Master label.

If you have any questions or need any additional information please contact me either by telephone at 202-393-3903 ext. 11 or by e-mail at wmccombie@lewisharrison.com.

Thank you in advance for your assistance with this submission.

Sincerely,



Wendy A. McCombie
Agent for,
Sterilex Corporation

cc: Mark Wozniak, Sterilex Corporation

